

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE**  
Nashville Division

MICHAEL DAVID SILLS AND MARY SILLS

Case No. 3:23-CV-00478

v.

SOUTHERN BAPTIST CONVENTION, ET AL

Judge William L. Campbell, Jr.

**MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to Rule 83.01 of the Local Rules of Court for the United States District Court Middle District of Tennessee, Thomas E. Travis hereby moves for admission to appear *pro hac vice* in the above-captioned action as counsel for The Southern Baptist Theological

Pursuant to 29 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct:

1. I am a member in good standing of the [Identify United States District Court or United States appellate court of which movant is a member]. Attached is a Certificate of Good Standing from that court.

2. I am not, nor have I ever been, the subject of disciplinary proceedings by any disciplinary authority, court, or tribunal, except as provided below:

N/A

3. I have not been found in contempt by any court or tribunal, except as provided below:

N/A

4. I have not been sanctioned pursuant to 28 U.S.C. § 1927, except as provided below:

N/A

5. I have never been censured, suspended, disbarred, or denied admission or readmission by any court or tribunal, except as provided below.

N/A

6. I have not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below:

N/A

7. I understand that pursuant to Local Rule 83.01(d)(1), if I am not both a member of the Tennessee bar and admitted to the bar of this Court, local counsel must be retained. Below is the name, address, phone number, and e-mail address of local counsel retained in this matter:

James C. Bradshaw III, #13170  
333 Commerce Street, Suite 1050  
Nashville, Tennessee 37201  
jbradshaw@wyattfirm.com

8. I have read and am familiar with Local Rules of Court for the United States District Court Middle District of Tennessee.

9. By seeking admission to practice before this Court, I acknowledge my responsibility for compliance with all rules of this Court and confer disciplinary jurisdiction upon this Court for any alleged misconduct arising in the course of the proceeding.

/s/ Thomas E. Travis Signature

Name: Thomas E. Travis

State where admitted and State Bar Number: Kentucky, #9687

Business Address: 250 West Main Street, Suite 1600, Lexington, Kentucky 40507

Local Address [if different from above]:

Phone: (859) 288-7426

Email: ttravis@wyattfirm.com

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the following Notice of Appearance was emailed to counsel via the Court's Electronic Filing System (ECF) on this the 13<sup>th</sup> day of June, 2023:

<p>Gary E. Brewer, #942 BREWER AND TERRY, P.C. Attorneys at Law 1702 W. Andrew Johnson Hwy. P.O. Box 2046 Morristown, TN 37816 <a href="mailto:robin@brewerandterry.com">robin@brewerandterry.com</a></p> <p>John W. ("Don") Barrett Katherine Barrett Riley (TN BPR#: 021155) BARRETT LAW GROUP, P.A. 404 Court Square North P.O. Box 927 Lexington, MS 39095 <a href="mailto:dbarrett@barrettlawgroup.com">dbarrett@barrettlawgroup.com</a> <a href="mailto:kbriley@barrettlawgroup.com">kbriley@barrettlawgroup.com</a></p> <p>Shannon M. McNulty CLIFFORD LAW OFFICES, P.C. 120 N. LaSalle Street, 36th Floor Chicago, Illinois 60602 <a href="mailto:mm@cliffordlaw.com">mm@cliffordlaw.com</a></p> <p><i>Counsel for Plaintiffs</i></p>	<p>George H. Cate, III Kimberly M. Ingram- Hogan Bradley Arant Boulton Cummings LLP 1600 Division St., Suite 700 Nashville, TN 37203 <a href="mailto:gcate@bradley.com">gcate@bradley.com</a> <a href="mailto:kingram@bradley.com">kingram@bradley.com</a></p> <p><i>Counsel for Defendant LifeWay Christian Resources</i></p> <p>R. Bruce Barze, Jr. Barze Taylor Noles Lowther LLC 2204 Lakeshore Dr., Suite 425 Birmingham, AL 35209 <a href="mailto:bbarze@btnllaw.com">bbarze@btnllaw.com</a></p> <p><i>Counsel for Defendant Eric Geiger</i></p> <p>John R. Jacobson, Esq. Katherine R. Klein, Esq. Riley &amp; Jacobson, PLC 1906 West End Avenue Nashville, Tennessee 37203 <a href="mailto:jjacobson@rjfirm.com">jjacobson@rjfirm.com</a> <a href="mailto:kklein@rjfirm.com">kklein@rjfirm.com</a></p>
<p>Ronald G. Harris Philip N. Elbert Olivia R. Arboneaux Neal &amp; Harwell, PLC 1201 Demonbreun St., Suite 1000 Nashville, TN 37203 <a href="mailto:rharris@nealharwell.com">rharris@nealharwell.com</a> <a href="mailto:pelbert@nealharwell.com">pelbert@nealharwell.com</a> <a href="mailto:oarboneaux@nealharwell.com">oarboneaux@nealharwell.com</a></p> <p><i>Counsel for Defendant Jennifer Lyell</i></p>	<p>Steven G. Mintz, Esq. Terence W. McCormick, Esq. 600 Third Avenue, 25th Floor New York, NY 10016 <a href="mailto:mintz@mintzandgold.com">mintz@mintzandgold.com</a> <a href="mailto:mccormick@mintzandgold.com">mccormick@mintzandgold.com</a></p> <p><i>Counsel for Defendants Guidepost Solutions, LLC and SolutionPoint International, Inc</i></p>

*/s/ Thomas E. Travis*